

Exhibit D

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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REED GALIN,

Plaintiff,

vs.

Case No.
1:15-CV-06992 (JMF)

KUNITAKE HAMADA,

Defendant.

-----X

DEPOSITION OF REED GALIN

New York, New York

October 11, 2016

1:30 p.m.

Reported by:
Maureen Ratto, RPR, CCR
JOB NO. 46933

<p style="text-align: right;">18</p> <p>1 GALIN</p> <p>2 tell you, other than that, did she tell</p> <p>3 you that -- anything that led you to</p> <p>4 believe that Coe Kerr Gallery had any</p> <p>5 reason to suspect that David Ramus had</p> <p>6 done anything criminal prior to 1995?</p> <p>7 MR. ALTMAN: Objection to the</p> <p>8 form.</p> <p>9 A. This was a pretty brief</p> <p>10 conversation. We were speaking mostly in</p> <p>11 generalities.</p> <p>12 Q. Do you have any reason to</p> <p>13 believe that prior to the time you spoke</p> <p>14 to People Magazine about David Ramus that</p> <p>15 Coe Kerr Gallery had any reason to have a</p> <p>16 different opinion of David Ramus than you</p> <p>17 expressed to People Magazine?</p> <p>18 MR. ALTMAN: Objection to the</p> <p>19 form.</p> <p>20 A. I think that anybody who was</p> <p>21 doing business with David Ramus over time</p> <p>22 certainly understood that he was a con</p> <p>23 man.</p> <p>24 Q. Sorry?</p> <p>25 A. That he was a con man.</p>	<p style="text-align: right;">20</p> <p>1 GALIN</p> <p>2 MR. ALTMAN: Objection to the</p> <p>3 form.</p> <p>4 A. I believe --</p> <p>5 Q. Didn't you just tell me</p> <p>6 everyone who did business with David</p> <p>7 Ramus knew he was a con man?</p> <p>8 A. At the time --</p> <p>9 Q. Didn't you just tell me you</p> <p>10 did business with a con man and you</p> <p>11 didn't know he was a con man?</p> <p>12 A. We are interrupting each</p> <p>13 other.</p> <p>14 Q. I get to ask the question and</p> <p>15 you answer them. That's the rule.</p> <p>16 A. Within the frame that we were</p> <p>17 discussing before, it was in the 1990s,</p> <p>18 early to mid '90s by then certainly</p> <p>19 everybody knew he was a con man, and I</p> <p>20 believe other people knew before or</p> <p>21 certainly suspected he was a con man.</p> <p>22 Q. You didn't even think he was a</p> <p>23 con man after he was indicted, did you?</p> <p>24 A. I knew he was a con man before</p> <p>25 he went to prison.</p>
<p style="text-align: right;">19</p> <p>1 GALIN</p> <p>2 Q. And what's your basis for</p> <p>3 saying that?</p> <p>4 A. Well, he ended up in Talladega</p> <p>5 Federal Prison, for one thing.</p> <p>6 Q. How would somebody who did</p> <p>7 business with David Ramus in 1989 have</p> <p>8 known he was a con man?</p> <p>9 MR. ALTMAN: Objection to the</p> <p>10 form of the question.</p> <p>11 A. I couldn't speak to all of</p> <p>12 David's relationships and business</p> <p>13 dealings.</p> <p>14 Q. Did you do any business with</p> <p>15 David Ramus before you gave this</p> <p>16 interview to People Magazine?</p> <p>17 MR. ALTMAN: Before the</p> <p>18 interview in 1995?</p> <p>19 MR. CAHILL: Yes.</p> <p>20 A. Yes.</p> <p>21 Q. And did you know that David</p> <p>22 Ramus was a con man before?</p> <p>23 A. No.</p> <p>24 Q. So how was Coe Kerr supposed</p> <p>25 to know that David Ramus was a con man?</p>	<p style="text-align: right;">21</p> <p>1 GALIN</p> <p>2 Q. At the time you gave this</p> <p>3 interview, at the time you spoke to</p> <p>4 People Magazine, you said you didn't</p> <p>5 think he had done anything criminal?</p> <p>6 A. I said I didn't believe he had</p> <p>7 done anything criminal.</p> <p>8 Q. And you didn't believe he had</p> <p>9 ripped anybody off?</p> <p>10 A. I wasn't convinced he ripped</p> <p>11 people off, because I didn't want to</p> <p>12 be --</p> <p>13 Q. My question is what, if</p> <p>14 anything, persuades you that other people</p> <p>15 who did business with him, who weren't</p> <p>16 his best friend, believed he was a con</p> <p>17 man prior to 1995?</p> <p>18 MR. ALTMAN: Objection to the</p> <p>19 form of the question.</p> <p>20 A. Other people weren't blinded</p> <p>21 by their long history of association and</p> <p>22 friendship with Mr. Ramus.</p> <p>23 Q. Okay. So what business did you</p> <p>24 do with Mr. Ramus?</p> <p>25 A. We -- we were involved with</p>

<p style="text-align: right;">26</p> <p>1 GALIN</p> <p>2 was at Christie's?</p> <p>3 A. He bought the painting. I</p> <p>4 don't know if there were others.</p> <p>5 Q. So nothing -- nothing at the</p> <p>6 time that she had -- when she was dealing</p> <p>7 with David Ramus caused her not to</p> <p>8 complete a transaction with David Ramus?</p> <p>9 A. I wouldn't know that. There</p> <p>10 could have been other instances.</p> <p>11 Q. Did she -- what, if anything,</p> <p>12 did she tell you about dealings of others</p> <p>13 with David Ramus?</p> <p>14 A. She didn't tell me anything</p> <p>15 specific about dealings with others.</p> <p>16 Q. She didn't give you names of</p> <p>17 anyone who did business with him?</p> <p>18 A. I don't recall that she did.</p> <p>19 Q. Did she give you any specifics</p> <p>20 of any business that anyone else did with</p> <p>21 David Ramus?</p> <p>22 A. I don't recall that she did.</p> <p>23 She did indicate that Coe Kerr had -- had</p> <p>24 an association of some sort with David</p> <p>25 Ramus.</p>	<p style="text-align: right;">28</p> <p>1 GALIN</p> <p>2 grade.</p> <p>3 Q. And what was your relationship</p> <p>4 with him?</p> <p>5 A. We were classmates together.</p> <p>6 Q. And for how long did you</p> <p>7 maintain a relationship with Mr. Adelson?</p> <p>8 A. Until about the time that I</p> <p>9 found out for sure exactly what had</p> <p>10 happened in the Ice Storm case.</p> <p>11 Q. Was the transaction with the</p> <p>12 Ice Storm the only business transaction</p> <p>13 you engaged in with Mr. Ramus?</p> <p>14 A. There was one previous.</p> <p>15 Q. What was that?</p> <p>16 A. That was a painting that we</p> <p>17 bought and sold before Ice Storm.</p> <p>18 Q. And what was that painting?</p> <p>19 A. A Gaston La Touche painting</p> <p>20 called The Picnic.</p> <p>21 Q. And when was that purchased?</p> <p>22 A. I think it was maybe a year</p> <p>23 and a half before that, a year before.</p> <p>24 I'm not sure.</p> <p>25 Q. And what was the nature of</p>
<p style="text-align: right;">27</p> <p>1 GALIN</p> <p>2 Q. What sort of association?</p> <p>3 A. That they had done business.</p> <p>4 That Adelson -- and I had heard David</p> <p>5 actually speak of Adelson, had -- had a</p> <p>6 relationship with Ramus.</p> <p>7 Q. What kind of relationship did</p> <p>8 David tell you he had with Mr. Adelson?</p> <p>9 A. My recollection is he sort of</p> <p>10 felt about him as if he were -- what is</p> <p>11 the word I'm looking for? -- that he was</p> <p>12 an almost a protegee of Mr. Adelson, that</p> <p>13 he respected his acumen and his knowledge</p> <p>14 in the art world.</p> <p>15 Q. Did he ever say anything</p> <p>16 negative about Mr. Adelson?</p> <p>17 A. Not to me.</p> <p>18 Q. Did Mr. Ramus ever tell you</p> <p>19 that he had engaged in any transactions</p> <p>20 with Mr. Adelson that were unethical?</p> <p>21 A. David wouldn't admit to such a</p> <p>22 thing.</p> <p>23 Q. When did you first meet</p> <p>24 Mr. Ramus?</p> <p>25 A. Well, somewhere around third</p>	<p style="text-align: right;">29</p> <p>1 GALIN</p> <p>2 that transaction?</p> <p>3 A. We invested in it together.</p> <p>4 Actually, I think I owned that painting</p> <p>5 myself and then sold it.</p> <p>6 Q. How much did you pay for it?</p> <p>7 A. 80-something-thousand maybe.</p> <p>8 Q. And what role, if any, did</p> <p>9 David Ramus play in the transaction?</p> <p>10 A. He found the painting and sold</p> <p>11 the painting with my approval.</p> <p>12 Q. So when you said -- did you</p> <p>13 give him 80-some-odd-thousand dollars to</p> <p>14 purchase the painting for you?</p> <p>15 A. Yes, I did.</p> <p>16 Q. Did he --</p> <p>17 A. It might have been in the</p> <p>18 '90s, somewhere around there.</p> <p>19 Q. Did he ever give the painting</p> <p>20 to you?</p> <p>21 A. I didn't take the painting,</p> <p>22 no.</p> <p>23 Q. Did you say Mr. Ramus -- so</p> <p>24 did Mr. Ramus hold onto the painting for</p> <p>25 you?</p>

<p style="text-align: right;">30</p> <p>1 GALIN</p> <p>2 A. He did.</p> <p>3 Q. For how long did he hold onto</p> <p>4 the painting?</p> <p>5 A. I think it was about a year.</p> <p>6 Q. And at that point did he sell</p> <p>7 the painting?</p> <p>8 A. He called me up one day and</p> <p>9 said let's discuss the painting; what do</p> <p>10 you want to do with it? I may have found</p> <p>11 a buyer for it? What do you think?</p> <p>12 Because we had an express understanding</p> <p>13 on that deal, as we did with Ice Storm,</p> <p>14 that the painting would not be sold</p> <p>15 unless I specifically agreed in advance</p> <p>16 that that would happen.</p> <p>17 Q. But you did leave the painting</p> <p>18 with Mr. Ramus?</p> <p>19 A. Yes, I did.</p> <p>20 Q. And what was Mr. Ramus'</p> <p>21 profession at that time?</p> <p>22 A. He was an art dealer.</p> <p>23 Q. Did you come to any agreement</p> <p>24 about selling that painting to Mr. Ramus?</p> <p>25 A. I agreed to let him sell the</p>	<p style="text-align: right;">32</p> <p>1 GALIN</p> <p>2 been something approaching -- it was less</p> <p>3 than half.</p> <p>4 Q. And what discussions did you</p> <p>5 have about what to do with the remainder</p> <p>6 of the money with Mr. Ramus at that time?</p> <p>7 A. Well, I don't know that it was</p> <p>8 immediate, but at some point after that,</p> <p>9 not too long after that he reached the</p> <p>10 spectre of there being an Andrew Wyeth</p> <p>11 painting that he was excited about, that</p> <p>12 he wanted to discuss with me and did I</p> <p>13 want to maybe be involved in that.</p> <p>14 Q. And what did you say?</p> <p>15 A. I said wow, that's a name I</p> <p>16 know. Sounds like an impressive painting.</p> <p>17 I could certainly discuss that with you</p> <p>18 and I subsequently agreed that that's</p> <p>19 what we would do.</p> <p>20 Q. You say that -- what was the</p> <p>21 outline of your agreement with Mr. Ramus</p> <p>22 about that Wyeth painting?</p> <p>23 A. We were going to own the</p> <p>24 painting together. I was going to invest</p> <p>25 in it and he was going to also include</p>
<p style="text-align: right;">31</p> <p>1 GALIN</p> <p>2 painting.</p> <p>3 Q. And did he?</p> <p>4 A. Yes.</p> <p>5 Q. And how much did he --</p> <p>6 A. I think it was 110, 112,000.</p> <p>7 Q. And you said that was about a</p> <p>8 year and a half?</p> <p>9 A. I think so.</p> <p>10 Q. So if you acquired it in 1987</p> <p>11 would that have been sometime in late</p> <p>12 1988 or early 1989?</p> <p>13 A. I'm a little lose on the</p> <p>14 timing but probably, yes.</p> <p>15 Q. Did Mr. Ramus pay you the</p> <p>16 proceeds of the sale of that painting?</p> <p>17 A. Some of the money.</p> <p>18 Q. What happened to the rest of</p> <p>19 the money?</p> <p>20 A. We were already discussing my</p> <p>21 investing in another painting.</p> <p>22 Q. And what discussions did you</p> <p>23 have with Mr. Ramus about -- so how much</p> <p>24 money did he pay you?</p> <p>25 A. I don't recall. It might have</p>	<p style="text-align: right;">33</p> <p>1 GALIN</p> <p>2 another investor.</p> <p>3 Q. At that time did Mr. Ramus</p> <p>4 have any financial problems?</p> <p>5 A. Yes.</p> <p>6 Q. Were you aware of those</p> <p>7 financial problems?</p> <p>8 A. No.</p> <p>9 Q. Do you know of anyone who was</p> <p>10 aware of his financial problems at that</p> <p>11 time?</p> <p>12 A. I wouldn't know.</p> <p>13 Q. At that time did you acquire</p> <p>14 any ownership interest in the Wyeth</p> <p>15 painting?</p> <p>16 A. Yes.</p> <p>17 Q. And what -- what was the</p> <p>18 nature of your ownership interest?</p> <p>19 A. A third of the painting.</p> <p>20 Q. Did you leave the -- did you</p> <p>21 ever take possession of the Wyeth</p> <p>22 painting?</p> <p>23 A. I did not.</p> <p>24 Q. Did you leave it in Mr. Ramus'</p> <p>25 possession?</p>

<p style="text-align: right;">82</p> <p>1 GALIN 2 that correct? 3 A. I don't have that in writing, 4 no. 5 Q. And what makes you say that it 6 was fraudulent for Mr. Ramus to -- the 7 transfer was fraudulent because 8 Mr. Ramus, you say, didn't have your 9 authority? 10 A. I think I just answered that. 11 To me that's fraud. 12 Q. Is that a fraud by Coe Kerr? 13 A. I don't know. 14 Q. Do you have any indication -- 15 do you know of anything that indicates 16 that Coe Kerr acted fraudulently in 17 connection with the transfer of the 18 painting? 19 A. Well, we just discussed my 20 belief that all of this was not on the 21 up-and-up. I don't have anything 22 specifically myself to point out and say 23 this proves it at this moment. 24 Q. Do you have any reason to 25 believe that the Coe Kerr Gallery acted</p>	<p style="text-align: right;">84</p> <p>1 GALIN 2 about the provenance of the painting? 3 A. I don't, no. 4 Q. How do you know that the Coe 5 Kerr Gallery had previously owned the 6 Wyeth painting? 7 A. Christie's listed them in the 8 provenance. 9 Q. So would you agree with me the 10 Coe Kerr Gallery at least knew that it 11 was in the provenance? 12 A. I would assume so. 13 Q. What else, if anything, do you 14 think the Coe Kerr Gallery should have 15 known about the provenance at the time it 16 acquired the painting from -- 17 A. I wouldn't know what else they 18 should know. 19 MR. ALTMAN: Objection to 20 form. 21 Q. What, if anything, do you know 22 about what the Coe Kerr Gallery did to 23 investigate the provenance of the 24 painting? 25 A. I have no idea what they did</p>
<p style="text-align: right;">83</p> <p>1 GALIN 2 criminally? 3 A. Reason to believe? Not in a 4 comprehensive way. 5 Q. Do you have any reason to 6 believe that Coe Kerr Gallery acted 7 criminally in anything other than in a 8 comprehensive way? 9 A. We're going to go back to my 10 gut feeling. 11 Q. Anything beyond that? 12 A. Not specifically. I did 13 mention that half his transactions have 14 been known to be criminal. So it gives 15 rise to very bona fide concerns about the 16 other half. 17 Q. What criminal action did 18 Mr. Ramus take with respect to you? 19 A. He stole the painting. 20 Q. He stole the painting? 21 A. Yes. And the U.S. Justice 22 Department specifically identified me as 23 a victim of Mr. Ramus' crimes. 24 Q. Do you know what, if anything, 25 did the Coe Kerr Gallery di to learn</p>	<p style="text-align: right;">85</p> <p>1 GALIN 2 to investigate or not investigate. I'd 3 like to find out. 4 Q. Do you know of any -- do you 5 have any information to suggest that they 6 -- that the Coe Kerr Gallery failed to 7 investigate the provenance of the 8 painting? 9 A. Nothing beyond what we've 10 discussed. 11 Q. Did the transaction documents 12 that you've seen concerning the transfer 13 of the painting to the Coe Kerr Gallery 14 have any inaccurate information about the 15 provenance? 16 A. Have any -- 17 Q. -- inaccurate information. 18 A. The documents that I have 19 don't have any information about the 20 provenance. 21 Q. Is there any information about 22 the provenance that you believe should 23 have given the Coe Kerr Gallery reason 24 for concern about the painting? 25 A. About the provenance as listed</p>

<p style="text-align: right;">102</p> <p>1 GALIN</p> <p>2 mentioned the Coe Kerr Gallery to me</p> <p>3 directly.</p> <p>4 Q. What discussions did you have</p> <p>5 with Harry Pettigrew about the painting</p> <p>6 or the Coe Kerr Gallery?</p> <p>7 A. I don't recall that I ever</p> <p>8 discussed the painting with Mr. Pettigrew</p> <p>9 directly. Those conversations may have</p> <p>10 been about the machinations of the</p> <p>11 bankruptcy proceedings. I'm sure I never</p> <p>12 discussed the Coe Kerr Gallery with</p> <p>13 Mr. Pettigrew.</p> <p>14 Q. You identified 15 art</p> <p>15 galleries and museums with whom you had</p> <p>16 discussions about the painting. Do you</p> <p>17 remember any specifics of any of those</p> <p>18 discussions?</p> <p>19 A. The Brandywine River Museum, I</p> <p>20 wrote them an e-mail inquiring about the</p> <p>21 Ice Storm painting and how one might go</p> <p>22 about finding where an Andrew Wyeth</p> <p>23 painting resided.</p> <p>24 Q. Did they ever reply to that</p> <p>25 e-mail?</p>	<p style="text-align: right;">104</p> <p>1 GALIN</p> <p>2 Q. What conversations did you</p> <p>3 have with the Farnsworth Art Museum</p> <p>4 concerning the painting?</p> <p>5 A. Similar. Over the phone with</p> <p>6 someone at the museum, a curator probably</p> <p>7 who I was referred to at the time. I</p> <p>8 didn't write it down.</p> <p>9 Q. At what time -- during what</p> <p>10 timeframe did you contact the Farnsworth</p> <p>11 Art Museum?</p> <p>12 A. 2005-ish.</p> <p>13 Q. When did you contact the</p> <p>14 Adelson Galleries?</p> <p>15 A. I can maybe save you a little</p> <p>16 time here; Adelson, Hollis Taggart,</p> <p>17 Owings, all these New York galleries, I</p> <p>18 would have walked into these galleries on</p> <p>19 a visit to New York sometime between 2000</p> <p>20 and 2005 and engaged someone in</p> <p>21 conversation about David Ramus, mentioned</p> <p>22 the painting and asked if anyone had ever</p> <p>23 come across it or might have suggestions</p> <p>24 of how someone might find such a work of</p> <p>25 art.</p>
<p style="text-align: right;">103</p> <p>1 GALIN</p> <p>2 A. Yes, they did.</p> <p>3 Q. What did they say?</p> <p>4 A. They misunderstood the nature</p> <p>5 of my question. They thought I was asking</p> <p>6 about how I might get a copy of the</p> <p>7 painting. So I called them back, and I do</p> <p>8 not remember who I spoke to, and I said</p> <p>9 no, that's not the nature of my</p> <p>10 communication. What I'd like to know is</p> <p>11 do you have some sort of registry about</p> <p>12 the Wyeth painting, where you might know</p> <p>13 where this one is. They said no, we don't</p> <p>14 know where this one is.</p> <p>15 Q. Did you have any conversations</p> <p>16 with the Chadds Ford Gallery?</p> <p>17 A. As I recall, I called them on</p> <p>18 the phone and asked them similar</p> <p>19 questions to what I described with</p> <p>20 Brandywine.</p> <p>21 Q. When did you call them on the</p> <p>22 phone?</p> <p>23 A. It was quite sometime ago.</p> <p>24 Somewhere the same timeframe probably.</p> <p>25 .I don't know, might have been 10 years.</p>	<p style="text-align: right;">105</p> <p>1 GALIN</p> <p>2 Q. Who did you speak to at the</p> <p>3 Adelson Galleries?</p> <p>4 A. I don't recall.</p> <p>5 Q. Are the Adelson Galleries at</p> <p>6 all associated with the gentleman named</p> <p>7 Adelson who you referred to as having</p> <p>8 some connection to the Coe Kerr Gallery?</p> <p>9 A. I would assume so, but I don't</p> <p>10 know that.</p> <p>11 Q. Did you ever send any more</p> <p>12 information to any of the people</p> <p>13 identified in answer to your</p> <p>14 interrogatory number 4 about the</p> <p>15 painting, such as an image of the</p> <p>16 painting and how to contact you if they</p> <p>17 saw it?</p> <p>18 A. I know that I sent the</p> <p>19 Brandywine Museum a picture of the</p> <p>20 painting. I don't recall whether I did</p> <p>21 that with anyone else. I don't think so.</p> <p>22 Q. Do you have a copy of what you</p> <p>23 sent to the Brandywine Museum?</p> <p>24 A. I don't know.</p> <p>25 Q. Have you looked for it?</p>

<p style="text-align: right;">106</p> <p>1 GALIN</p> <p>2 A. I don't recall, but if you</p> <p>3 like I can look for it.</p> <p>4 Q. I don't want to burden you if</p> <p>5 you looked for it.</p> <p>6 What have you done to look for</p> <p>7 documents that concern the painting, in</p> <p>8 this case?</p> <p>9 A. I've been through my old</p> <p>10 computer e-mails and such and through my</p> <p>11 hard copy files that I saved from that</p> <p>12 time.</p> <p>13 Q. Did you ever call anyone from</p> <p>14 law enforcement about the -- to inquire</p> <p>15 about the painting?</p> <p>16 A. I spoke to the FBI that was</p> <p>17 investigating David.</p> <p>18 Q. Who at the FBI?</p> <p>19 A. I don't recall but they don't</p> <p>20 discuss open cases, so nothing was</p> <p>21 revealed there. I spoke to people in the</p> <p>22 U.S. Attorneys' Office, as did other</p> <p>23 victims of his crimes.</p> <p>24 Q. Are you aware of any art loss</p> <p>25 registries?</p>	<p style="text-align: right;">108</p> <p>1 GALIN</p> <p>2 Q. If you go to page 3 and</p> <p>3 interrogatory 8, interrogatory asks you</p> <p>4 to identify all persons known to be</p> <p>5 employed by the Coe Kerr Gallery in 1989.</p> <p>6 You identified David Ramus and others not</p> <p>7 known.</p> <p>8 Was David Ramus employed by</p> <p>9 the Coe Kerr Gallery?</p> <p>10 A. Not as far as I know. That</p> <p>11 would be a mistake.</p> <p>12 Q. Do you know of anyone who was</p> <p>13 employed by the Coe Kerr Gallery?</p> <p>14 A. Well, I believe Mr. Adelson</p> <p>15 was. I don't know if you call him</p> <p>16 employed since he was an owner.</p> <p>17 Q. How do you know he was an</p> <p>18 owner?</p> <p>19 A. My lawyer informed me.</p> <p>20 Q. Do you have any other basis</p> <p>21 for that?</p> <p>22 A. I think subsequent to that I</p> <p>23 went to the internet and pulled up</p> <p>24 something that indicated Mr. Adelson had</p> <p>25 co-founded the Coe Kerr Gallery.</p>
<p style="text-align: right;">107</p> <p>1 GALIN</p> <p>2 A. I know that there is an art</p> <p>3 loss registry.</p> <p>4 Q. When did you first learn about</p> <p>5 that?</p> <p>6 A. Five years ago, maybe.</p> <p>7 Q. Did you ever register --</p> <p>8 A. Actually, it wasn't that long</p> <p>9 ago.</p> <p>10 Q. Did you ever register this</p> <p>11 painting with any art loss registry?</p> <p>12 A. No, I didn't.</p> <p>13 Q. Why not?</p> <p>14 A. Never occurred to me.</p> <p>15 Q. Did you ever post any</p> <p>16 information about this painting on the</p> <p>17 internet?</p> <p>18 A. Post information on the</p> <p>19 internet? No.</p> <p>20 Q. Why not?</p> <p>21 A. Well, it didn't occur to me</p> <p>22 either. I'm not sure where or how one</p> <p>23 does that. Sounds like an invitation for</p> <p>24 a lot of contact that really isn't very</p> <p>25 positive.</p>	<p style="text-align: right;">109</p> <p>1 GALIN</p> <p>2 Q. When was that information --</p> <p>3 when did you go on the internet?</p> <p>4 A. Within the last few months.</p> <p>5 Q. And what were you looking at</p> <p>6 that said Mr. Adelson --</p> <p>7 A. I don't remember.</p> <p>8 Q. -- had founded it?</p> <p>9 Why didn't you do that in 1996</p> <p>10 when you learned or the 1990s when you</p> <p>11 learned that the Coe Kerr Gallery had</p> <p>12 been involved?</p> <p>13 A. I couldn't do a Google search</p> <p>14 in 1990-whatever.</p> <p>15 Q. Why didn't you do it when you</p> <p>16 first became able to do a Google search?</p> <p>17 A. I didn't know Mr. Adelson was</p> <p>18 involved.</p> <p>19 Q. You knew that the Coe Kerr</p> <p>20 Gallery was involved?</p> <p>21 A. I did look up the Coe Kerr</p> <p>22 Gallery. It revealed nothing of interest.</p> <p>23 Q. Referring you back to</p> <p>24 Plaintiff's Exhibit 2, page 9, paragraph</p> <p>25 59 it says, "On information and belief</p>